

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
Case No.: 9:23-cv-81150-RLR

ANDREW TATE AND TRISTAN TATE,

Plaintiffs

vs.

EMMA GABBEY, MONA TABARA GABBEY,
WILLIAM GABBEY, ALIONA UNTILA,
AND MATTHIEU MARTELLY

Defendants.

**MOTION TO APPEAR *PRO HAC VICE*, FOR ATTORNEY VICTORIA HIRSCH,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Victoria Hirsch of the National Center On Sexual Exploitation, 1201 F. ST NW, Suite 200, Washington D.C. 20004, p. 202-393-7245, for purposes of appearance as co-counsel on behalf of Defendants Emma Gabbey, Mona Tabara Gabbey, William Gabbey, Aliona Untila, and Matthieu Martelly in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Victoria Hirsch to receive electronic filings in this case, and in support thereof states as follows:

1. Victoria Hirsch is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of Maryland and the State Bar of New Hampshire.

2. Movant, Christian W. Waugh, Esquire, of the law firm of Waugh PLLC, 201 E. Pine Street, Suite 315, Orlando, FL 32801, p. 321-800-6008, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Victoria Hirsch has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Victoria Hirsch, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Victoria Hirsch at email address: **vhirsch@ncoselaw.org**.

WHEREFORE, Christian W. Waugh, moves this Court to enter an Order Victoria Hirsch, to appear before this Court on behalf of the Defendants, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Victoria Hirsch.

Date: August 18, 2023

/s/ Christian W. Waugh
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